

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE

In re:	§	Chapter 11 Case
	§	
Old LC, Inc., <i>et al.</i> <sup>1</sup>	§	Case No. 19-11791 (BLS)
	§	
Debtors.	§	Jointly Administered

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Official Committee of Unsecured Creditors	§	
of Old LC, Inc., et al., for and on behalf of	§	
the estates of Old LC, Inc., <i>et al.</i> ;	§	
	§	
<i>Plaintiff,</i>	§	
	§	
v.	§	Adv. No. 20-51002 (BLS)
	§	
Upfront V, LP, Breakwater Credit	§	
Opportunities Fund, L.P.; Upfront GP V,	§	
LLC; Mark Suster; Dana Kibler; Gregory	§	
Bettinelli; Saif Mansour; Aamir Amdani;	§	
Eric Beckman; Darrick Geant; and Joseph	§	
Kaczorowski	§	
	§	
<i>Defendants.</i>	§	

**PLAINTIFF'S NOTICE TO TAKE ORAL DEPOSITION**  
**OF DEFENDANT DARRICK GEANT**

TO: Derrick Geant  
c/o Jody C. Barillare  
MORGAN, LEWIS & BOCKIUS LLP  
1201 N. Market Street, Suite 2201  
Wilmington, Delaware 19801

PLEASE TAKE NOTICE that pursuant to Federal Rule of Bankruptcy Procedure 9016 and Federal Rule of Civil Procedure 45(a)(4), Plaintiff Official Committee of Unsecured Creditors of Old LC, Inc., et al., for and on behalf of the estates of Old LC, Inc., *et al.* (the "Plaintiff") hereby notifies all parties to this action and their counsel of record of Plaintiff's intention to take the oral deposition of Derrick Geant. This deposition will take place by Zoom video conference on

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<sup>1</sup> The Debtors are the following four entities (the last four digits of their respective taxpayer identification numbers, if any, follow in parentheses): Old LC, Inc. (7119), Old LC Holdings, Inc., Old LCF, Inc., and Old LC Parent, Inc. The Debtors' noticing address in these Chapter 11 cases is c/o Bryan Cave Leighton Paisner LLP, Attn: Mark I. Duedall, 1201 W. Peachtree Street, 14<sup>th</sup> Floor, Atlanta, Georgia 30309.

Monday, July 19, 2021, at 9:30 a.m. eastern, and continue thereafter from hour to hour and day to day until completed. This deposition will be conducted pursuant to, and in accordance with, the Federal Rules of Civil Procedure before a certified court reporter. This deposition will be recorded stenographically and will be videotaped.

Dated: June 22, 2021  
Wilmington, Delaware

Respectfully submitted,

**MORRIS JAMES LLP**

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***Counsel for Plaintiff***

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and correct copy of the foregoing was served pursuant to the Federal Rules of Bankruptcy Procedure on this 21st day of June, 2021.

/s/ Joel B. Bailey

Joel B. Bailey